

# **Exhibit 1**

1 from, or about a person; a person is indicated on the DOCUMENT as having received a copy;  
 2 and/or a person, thing, practice or other subject matter is referred to, described or mentioned in  
 3 its text.

4 8. The terms “**AND**” and “**OR**” shall be construed conjunctively rather than  
 5 disjunctively, as is necessary to make each request inclusive rather than exclusive.

6 9. The terms “**ANY**” and “**ALL**” shall both be interpreted in the most inclusive  
 7 light and shall include “**ANY** and **ALL**.”

8 10. The term “**PHARMACY EMPLOYEES**” shall mean all non-exempt employees  
 9 of CVS who held the position of pharmacist, pharmacy manager, pharmacy technicians, or  
 10 pharmacy sales associate in California at any time during the period of August 3, 2016 to the  
 11 present date.

## 12 **SPECIAL INTERROGATORY**

### 13 **Special Interrogatory No. 1:**

14 Please IDENTIFY ALL PHARMACY EMPLOYEES employed by CVS in the state of  
 15 California during the period of August 3, 2016 to the present date. Please include each  
 16 individual’s full name, last known address, last known telephone number, and last known  
 17 email address (if any), position AND/OR title, location(s) of employment, and dates of  
 18 employment. *See Williams v. Superior Court* (2017) 3 Cal.5th 531; *Crab Addison, Inc. v.*  
 19 *Superior Court* (2009) 169 Cal.App.4th 958; *Pioneer Electronics (USA), Inc. v. Superior Court*  
 20 (2007) 40 Cal.4th 360.

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

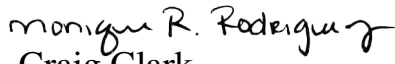
27 ///

28 ///

1 To the extent Defendant is concerned about privacy, Plaintiff is amenable to the use of a  
2 protective order or the use of the procedures outlined in *Belaire-West Landscape, Inc. v.*  
3 *Superior Court* (2007) 149 Cal.App.4th 554. Please contact Plaintiffs' counsel to discuss  
4 further.

5  
6 Dated: March 27, 2018

**CLARK LAW GROUP**

7  
8 By:   
9 R. Craig Clark  
Monique R. Rodriguez  
Attorneys for Plaintiffs